

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Kenneth P. Karl	:	Chapter 13
Joyce E. Karl	:	Case No.: 20-10328-ELF
Debtors(s)	:	

**MOTION TO INCUR ADDITIONAL DEBT
IN SUPPORT OF REFINANCING MORTGAGE**

Debtors, Kenneth and Joyce Karl, by and through their attorney Brad J. Sadek, respectfully move this Honorable Court for an Order allowing the debtors to incur additional debt in support of refinancing mortgage and hereby aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on January 17, 2020.
2. The Chapter 13 Plan was confirmed by this Honorable Court on June 30, 2020.
3. On December 22, 2020, an Order was entered Modifying the Confirmed Chapter 13 Plan.
4. Debtors wishes to refinance the real property located at 23 Hybrid Road Levittown, PA 19056.
5. The debtors received a Loan Estimate from Finance of America Mortgage with a new base amount of \$205,535.00. See Exhibit "A."
6. At the time of filing this Motion, per the Trustee's ledger to date, all but the present month's payment have been made, yielding a total of \$15,052.00 that has been paid to the Standing Chapter 13 Trustee over 21 months.
7. Allowing the refinance of the debtors' property would be beneficial to all parties as this refinance would combine the debtors' first and second mortgages into one consolidated payment which may help lessen future financial strain.

WHEREFORE, Debtors, by and through the undersigned counsel, request this Honorable Court to enter an Order allowing the incurrence of additional debt in support of the refinance on the real property located at 23 Hybrid Road Levittown, PA 19056.

Dated: November 10, 2021

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Sadek and Cooper Law Offices
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107